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**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

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JANE DOE,  
Plaintiff,  
v.  
RICARDO MUNGUA,  
Defendant.

Case No. 24-cv-394

**DECLARATION OF JANE DOE**

I, JANE DOE, being of full age, hereby declare:

1. I am the Plaintiff in the above-captioned case. I submit this Declaration in support of my request to proceed under the pseudonym “JANE DOE”

2. I make this request in a desperate attempt to preserve what remaining privacy I have left after Defendant and others posted my intimate images online, along with my name, profession and where my parents live, without my knowledge, permission, or consent.

3. Many years ago, I was in a long-distance relationship with an individual. During that time, we sent each other intimate pictures that were never intended to be shown to any other person.

4. Starting in late 2022, I learned that my ex-boyfriend illegally posted my photographs on the internet without my permission. The images were then taken by defendant

RICARDO MUNGUIA (“Defendant” or “Munguia”) and republished by him on pornographic websites.

5. I never met Defendant, have no relationship with Defendant, and have never had any communications with Defendant. Defendant never had my permission to reshare these images he certainly knew he did not have my consent to put them on pornography sites.

6. The impact Defendant’s actions have had on my life cannot be understated.

7. Defendant did not just put the most intimate images I have ever taken online, he did so in a way anyone could easily identify me. Many of the posts have my name, occupation, and school.

8. Since 2022, I have spent hundreds of hours attempting to scrub the internet of my images and identity. Given the nature of the internet, I have been forced to hire lawyers and professionals in multiple countries to assist me with this process.

9. Even with their help, however, my husband and I bear the heaviest burden of searching for and making initial requests for removal. I have monitored much of this progress on various spreadsheets and folders and am regimented and serious about tracking our requests and ensuring they are effectuated. I have created anonymous e-mail accounts to request removal of my content and sign such letters with names which are not my own.

10. I have gone to these efforts because my privacy is important to me and because I will do everything in my power to feel safe again.

11. Having my name associated with a filing such as this would further my damage and create a lasting effect. More so, it would provide reposters like Defendant with more identifying information about me and would likely lead to further reposting of my highly private images.

12. Being forced to proceed using my true name would be devastating and would only serve to accomplish what my ex-boyfriend was attempting to do when he shared the images in the first place: destroy my reputation and name forever.

13. The steps Defendant Munguia took to hide his identity from the public demonstrate he knew what he was doing was wrong. He was sharing my image on a Pinterest account entitled “Anonyway75[.]” The name Defendant provided when creating his account was “Wow Wow” and the e-mail he provided was [Anonyway75@gmail.com](mailto:Anonyway75@gmail.com) – another anonymous account.

14. Looking to the subscriber information he gave to Google, again he wrote his Name was Wow Wow.

15. Thankfully, one piece of identifying information which Defendant Munguia failed to mask was his I.P. address. Using these numbers, my attorney was able to determine the identity of this harasser: Ricardo Munguia of 5504 E. 74<sup>th</sup> East Avenue Tulsa, OK 74145.

16. While Munguia was clever enough to provide fake names and burner e-mail accounts when he spread my naked body all over the internet, he was not clever enough to use a VPN to do so and the I.P. addresses associated with the offending accounts traced back to his T-Mobile account.

17. I fear that if my name is included in the pleadings, Defendant will take the opportunity to further disseminate the intimate content and information about me online. It is clear based on the context of the postings that half the reason they are being shared is based on a stated desire to further “expose” me to maximize the harm I experience due to the content being online.

18. Defendant’s actions have been hurtful and humiliating enough; I am not certain I would be willing to proceed with a lawsuit against him if I were forced to broadcast to the world

that my intimate images are online and being used for sexual gratification purposes by complete strangers.

19. My attorneys have informed me that courts permit parties to proceed anonymously in situations involving highly sensitive matters and when forcing them to use their full names would be revictimizing. That is exactly what would happen here.

20. Filing this lawsuit using my full name would be yet another invasion of my privacy and would force me to reveal more of my private moments and information to anyone who wishes to view the public record.

21. I respectfully ask for this court's assistance in allowing me to hold onto some parts of my private life without inextricably and publicly linking my name to Defendant's heinous acts.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 22, 2024

/s/ Jane Doe  
Jane Doe